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October 26, 2023

VIA ECF

Hon. Loretta A. Preska
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Plaintiff's request for an extension of time to respond to the October 12, 2023 Order is granted. Plaintiff shall respond by November 16, 2023. The Wang Defendants' deadline to respond is extended to December 7, 2023. Plaintiff's deadline to reply is extended to December 21, 2023.

SO ORDERED.

Loretta A. Preska
10/27/23

Re: *Mattel, Inc. v. AnimeFun Store, et al.*
Civil Case No. 18-cv-8824 (LAP)
Request for Extension of Time to Respond to October 12, 2023 Order

Dear Judge Preska,

We represent Plaintiff Mattel, Inc. ("Plaintiff" or "Mattel"), in the above-referenced action.¹ On October 12, 2023, the Court entered an order directing the parties to submit further briefing concerning the applicability and impact, if any, of *Abitron Austria GmbH v. Hetronic Int'l, Inc.*, 600 U.S. 412 (2023) on the resolution of the issues remaining in this case. ("October 12, 2023 Order"). (Dkt. 124). In accordance with Your Honor's Individual Rules of Practice, Plaintiff respectfully requests that the Court grant an extension of time to respond to the October 12, 2023 Order and submits the following:

1. **Original due date:** November 2, 2023.
2. **The number of previous requests for adjournment or extension of time:** None, this is the first request for an extension of time.
3. **The reason for the current request:** Plaintiff respectfully requests a short extension of time due to Plaintiff's counsel having several conflicting deadlines on and near the original due date.

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Complaint or Application.

4. **Whether the adversary consents:** Plaintiff emailed counsel for Defendants AnimeFun Store, Bingo 1993, Bingoes Hot Toy Factory, Miliy Store and Q374428329 (hereinafter “Wang Defendants”) to inquire as to whether they would consent to Plaintiff’s instant request and indicated that if Plaintiff did not receive any objections by the close of business on October 26, 2023, it would assume the Wang Defendants had no objections. Plaintiff did not receive any responses from the Wang Defendants.
5. **Proposed alternative dates:** Plaintiff respectfully requests that the deadline to file its response to the October 12, 2023 Order be extended to November 16, 2023.

Accordingly, Plaintiff respectfully requests that the Court grant an extension of time to respond to the October 12, 2023 Order.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

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